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ACCESSION NBR: 8706110181 DOC. DATE: 87/06/04 NOTARIZED: NO DOCKET #
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SUBJECT: Forwards responses to NRC 870327 request for addl info re Item 2.2 of Generic Ltr 83-28. Util interact frequently w/ Westinghouse via Westinghouse Owners Group & receives safety info on regular basis.

DISTRIBUTION CODE: A055D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 12
TITLE: OR/Licensing Submittal: Salem ATWS Events GL-83-28

NOTES: License Exp date in accordance with 10CFR2, 2.109(9/19/72). 05000244

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June 4, 1987

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Mr. Carl Stahle
PWR Project Directorate No. 1
Washington, D.C. 20555

Subject: NRC Letter of March 27, 1987 from C. Stahle to R. Kober
Request for Additional Information on Generic Letter 83-28, Item 2.2
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Stahle:

In your letter of March 27, 1987 you requested certain information regarding Item 2.2 of Generic Letter 83-28. Our responses to the information requested in Enclosures 1 and 2 of your letter are attached.

Although not specifically requested as part of Generic Letter 83-28, your March 27 letter asked if Ginna is included in the Westinghouse interface program in accordance with Item 2.1. Although Ginna does not participate in a formal Westinghouse interface program, RG&E does interact frequently with Westinghouse, via the Westinghouse Owners Group, and receives safety information such as Westinghouse Nuclear Service Division Technical Bulletins, on a regular basis.

Very truly yours,

Roger W. Kober

Roger W. Kober

Enclosures

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Enclosure 1 Item 1, NRC letter dated March 27, 1987

Request for Additional Information
Item 2.2 (Part 2) of Generic Letter 83-28
R.E. Ginna Nuclear Power Plant, Unit 1

1. NRC Concern:

The licensee should describe their program for establishing and maintaining interfaces with vendors of safety-related components which ensures that vendors are contacted on a periodic basis and that receipt of vendor equipment technical information (ETI) is acknowledged or otherwise verified.

This program description should establish that such interfaces are established with their NSSS vendor, as well as with the vendors of key safety-related components such as diesel generators, electrical switchgear, auxiliary feedpumps, emergency core cooling system (ECCS) pumps, batteries, battery chargers, and valve operators, to facilitate the exchange of current technical information. The description should verify that controlled procedures exist for handling this vendor technical information which ensure that it is kept current and complete and that it is incorporated into plant operating, maintenance and test procedures as is appropriate.

Response:

As noted in RG&E's November 4, 1983 response to Section 2.2.2 of Generic Letter 83-28, RG&E was to establish a complete program of vendor interface following publication of INPO NUTAC 84-010. In accordance with that NUTAC, RG&E has initiated a Vendor Equipment Technical Information Program, consisting of the recommended NPRDS and SEE-IN programs. These programs as well as interaction with the NSSS vendor (Westinghouse), are considered an aid to RG&E personnel responsible for developing and maintaining plant instructions and procedures. However, the primary method for keeping RG&E personnel abreast of current vendor information and data is through the vendor manual program, described in Response 2 below. RG&E has implemented administrative procedures for maintaining vendor technical information received by RG&E current, and for incorporating the information into plant operating, maintenance, and test procedures.

RG&E has set up the NPRDS and SEE-IN programs, and participates in numerous interface activities with Westinghouse (Westinghouse Owners Group committees and sub-committees, plant modification and safety analysis contracts, W technical information bulletins and communications, standards committees and workshops, industry meetings, etc.). However, RG&E is still determining the proper level of active participation in the NPRDS and SEE-IN programs, in order to be resource-effective. This evaluation is being performed in conjunction with our Maintenance Self-Assessment Program, which is expected to be completed by the end of 1987.

Enclosure 1 Item 2, NRC letter dated March 27, 1987

Request for Additional Information
Item 2.2 (Part 2) of Generic Letter 83-28
R.E. Ginna Nuclear Power Plant, Unit 1

2. NRC Concern:

Where a formal vendor interface cannot be practicably established, the licensee should describe their program for compensating for the lack of a vendor interface. This program may reference the NUTAC/VETIP program, as described in INPO 84-010, issued in March 1984. If the NUTAC/VETIP program is referenced, the response should describe how procedures were revised to properly control and implement this program and to incorporate the program enhancements described in Section 3.2 of the NUTAC/VETIP report.

Response:

As noted in RG&E's response to Item 1 of Enclosure 1, a formal vendor interface program has not been established; however, a program to maintain vendor manuals current and complete has been implemented, using the guidance provided in INPO 84-010, as well as earlier guidance provided in INPO's Good Practice 84-028 (MA-304), "Control of Vendor Manuals". Vendor manuals are controlled at Ginna Station in the following manner:

The vendor manual program controls changes to vendor manuals which the Engineering department or General Maintenance have specifically indicated a need for controlling. The program also controls newly received vendor manuals associated with QA Program modifications.

For the purposes of this program, a vendor manual is defined as a manual provided by a manufacturer, vendor, or supplier which contains instructions on installation, operation, maintenance, testing, calibration, spare parts, and storage of items for which activities associated with design, procurement, installation, or use are governed by the QA Program. This includes items identified in Appendix A, Appendix D, and Appendix E to the Quality Assurance Manual.

The Vendor Manual Coordinator, who answers to the Central Records Clerk, is responsible for the implementation of the Vendor Manual program. As such, this person uses the experience and expertise of various areas of RG&E in implementing the program. For instance, the Engineering department has the responsibility to review new vendor manuals for applicability and accuracy and to forward the manuals to the Vendor Manual Coordinator. It is also the responsibility

of the Engineering department through the Technical Information Center to forward a list of vendor manuals desired to be controlled by the vendor manual program to the Vendor Manual Coordinator. Likewise, it is the responsibility of General Maintenance to review new vendor manuals associated with material handling equipment for applicability and accuracy and to forward the manuals to the Vendor Manual Coordinator. It is also the responsibility of General Maintenance to forward a list of vendor manuals desired to be controlled by the vendor manual program to the Vendor Manual Coordinator.

The program establishes that all personnel will be responsible for forwarding manuals and/or revisions to existing manuals to the Vendor Manual Coordinator. Likewise, initiators of procurement documents are responsible for requesting vendor manuals when purchasing equipment and to provide instructions on where the manuals shall be sent.

The enhancements described in Section 3.2 of the NUTAC/VETIP regarding the use of NPRDS have been incorporated, either in the NPRDS itself, or at Ginna Station.

- "component" definition now describes mechanical components.
- guidance regarding information on the role of piece parts as a factor in causing component failures, guidance relative to inadequate vendor information being a contributing factor in a failure, and guidance relative to the completeness of failure analysis, have all been provided in NPRDS.
- NPRDS has been modified to provide indication if preliminary reports will be revised later
- NPRDS-scope systems and components reflect the needs of Ginna Station

The proposed enhancement to SEE-IN has also been incorporated by RG&E. Specifically, RG&E has included into each component failure review a requirement to determine if inadequate or inaccurate vendor equipment technical information was the cause of the failure. (To date, this has not been a concern at Ginna Station.)

Enclosure 1 Item 3, NRC letter dated March 27, 1987

Request for Additional Information
Item 2.2 (Part 2) of Generic Letter 83-28
R.E. Ginna Nuclear Power Plant, Unit 1

3. NRC Concern:

The licensee should verify that the responsibilities of the licensee and vendors that provide service on safety-related equipment are defined such that control of applicable instructions for maintenance work on safety-related equipment are provided, consistent with the program enhancement described on page 23 of the NUTAC/VETIP report issued in March 1984.

Response:

Ginna Station Administrative Procedure A-401 provides the overall guidance for procurement for materials, parts, components and services procured under the Ginna Station QA Program requirements.

After determining that a need exists for a vendor or contractor to provide safety related services, the following requirements are specified in the purchasing process. The program described below meets the requirements of Page 23 of the NUTAC/VETIP report.

VENDOR QUALIFICATION

1. It is a Purchase Requisition requirement that the vendor have a documented QA program that implements portions or all of ANSI N-45.2 and appropriate daughter standards. The selection of suppliers is based on a Qualified Supplier's List (QSL) which is maintained by RG&E Purchasing Department.

2. It is a Purchase Requisition requirement for right of access to perform inspection and audits at vendor's facilities.

3. Vendors who do not have an acceptable documented QA Program are required to work under RG&E's QA program.

PROCUREMENT DOCUMENTATION

Additional quality documentation requirements are imposed on the vendor through the Purchasing Department after placement on the QSL.

Specific requirements are:

1. documentation necessary to verify implementation of their QA program must be provided;

2. Non-Conformances initiated by them are submitted to RG&E for review and/or approval;

3. confirmation that 10CFR Part 21 applies (as appropriate);

4. the supplier personnel qualifications and certifications shall be furnished by the supplier;

5. the supplier shall furnish special process reports as appropriate; and

6. Purchase Requisitions must specify that vendor generated procedures necessary to perform services are submitted for RG&E approval. RG&E documents the acceptance of the technical adequacy using A-705, Control of Purchased Services, Attachment I (Document Review Status Form).

   Furthermore, all vendor generated procedures are incorporated within Station Procedures and receive Technical, Quality and Plant Operating Review Committee review. This review and approval process assures control of applicable instructions for maintenance work on safety related equipment.

QA/QC PROGRAM RESPONSIBILITY

The Purchase Requisition describes the contractual relationship between the supplier and RG&E and defines the requirements for the QA program and personnel. RG&E may accept the supplier's QA program or require that the supplier work under the RG&E QA program based upon the complexity of the work, and manpower availability.

If the vendor QA program is used, Procedure A-1001 requires both scheduled and unscheduled RG&E QC surveillance of the vendor's activities. The process used to place suppliers on the QSL provides for the separate review and approval of the vendor's QA program.

Enclosure 2 Item 1, NRC letter dated March 27, 1987

Request for Additional Information
Item 2.2 (Part 1) of Generic Letter 83-28

1. Item 2.2.1 - Program

The licensee's response does not confirm that the information handling system consists of a single, concise, unambiguous listing of all safety-related components and parts.

Response:

The requests for additional information in this enclosure are directed at utilization of an information handling system in control of safety related activities. As discussed with the RG&E Project Manager and the Technical Reviewer, RG&E does not utilize a computerized information handling system. The responses to the requests, however, do address the process used by RG&E for control of these activities.

A detailed listing of all safety related components and parts is provided in Appendix A to the Ginna Quality Assurance Manual. This listing provides the basis for decision making in engineering, procurement and maintenance and contains the designation of safety-related structures, systems and components. This listing has been previously provided to the Staff. It is periodically updated and is a controlled distribution document.

Enclosure 2 Item 2, NRC letter dated March 27, 1987

Request for Additional Information
Item 2.2 (Part 1) of Generic Letter 83-28

2. Item 2.2.1.2 - Information Handling System

The licensee's response has not informed that the information handling system includes a list of safety-related equipment and that procedures exist which govern its development and validation.

Response:

RG&E does not use an electronic listing or other compilation of the information found in Appendix A to the Quality Assurance Manual. Thus, there is no need for verification or validation of supplemental listings or computer programs. Development and validation of Appendix A is controlled through a formal review and approval process to assure the listing's accuracy. Changes to Appendix A are prepared by an engineer in the Engineering Department, reviewed by Quality Assurance and approved by the Manager of Nuclear Engineering.

Enclosure 2 Item 3, NRC letter dated March 27, 1987

Request for Additional Information
Item 2.2 (Part 1) of Generic Letter 83-28

3. Item 2.2.1.3 - Use of the Equipment Classification Listing

The licensee's response has not confirmed that criteria and procedures exist which govern the use of the information handling system to determine that an activity is safety-related and what procedures for maintenance, surveillance, parts replacement and other activities defined in the introduction to 10CFR Part 50, Appendix B, apply to safety-related components.

Response:

The Technical Specifications for Ginna require that written procedures be produced, implemented and maintained covering activities that can affect the performance of safety related equipment. In order to comply with the intent of this mandate, procedures have been developed which require that maintenance, surveillance, parts replacement, or other activities concerning safety related equipment are performed in accordance with quality assurance guidelines as required by 10CFR50 Appendix B.

Determination that an activity is safety related -

Appendix A (Safety Related Listings and Diagrams) of the Ginna Station Quality Assurance Manual lists safety related equipment in the plant. It is the central document used to determine if activities affect safety related equipment.

Appendix A is used as a source document for procedure A-1603. This procedure details the use of the document used to request maintenance of Ginna Station equipment (including safety related equipment), the Maintenance Work Request and Trouble Report (MWR). It describes the routing and disposition of the MWR and in particular identifies Appendix A and describes how it is to be used to determine whether activities are safety related.

Procedures used for safety related activities -

In addition to A-1603 described above, the following procedures govern safety related activities.

A-502 - Plant Procedure Adherance Requirements

This procedure assures that safety related activities are conducted in a planned manner. Changes made during implementation, are required to be reviewed and controlled to ensure safe operation of the plant.

A-600 - Series of Administrative Procedures

These procedures provide controls on temporary and permanent changes to procedures and require periodic review of existing procedures including those having to do with safety related activities.

Equipment Specific Maintenance and Emergency Maintenance Procedures

Testing of the operability of redundant equipment as required by the Technical Specifications is covered by procedures that detail the maintenance of individual pieces of equipment, or systems. The Test and Results Department uses specific procedures to test the operability of redundant pieces of equipment and systems prior to performing maintenance.

A-52 - Series of Procedures

This series of procedures is used to track the allowable out of service time for repair of equipment in accordance with the limitations of the Technical Specifications.

Specific Procedures Used to Control Parts Replacement

A-801 - Control of Accepted Material Parts and Components

A-802 - Identification and Marking of Accepted Material Parts and Components

A-401 - Control of Procurement Documents

A-502 - Plant Procedure Content and Format Requirements

Lists specific tests to be performed on equipment before it is returned to service. In addition, this procedure details specific steps that must be performed in controlling the return to service.

A-701 - Receipt and Acceptance of Materials/Parts

A-1501 - Control of Non-Conforming Items

These procedures provide specific instructions for control of safety related activities. The procedures in this list provide the guidance and criteria necessary to determine that an activity is safety related and to assure that procedures exist to control the activities which are safety related.

Enclosure 2 Item 4, NRC letter dated March 27, 1987

Request for Additional Information
Item 2.2 (Part 1) of Generic Letter 83-28

4. Item 2.2.1.4 - Management Controls

The licensee's response has not confirmed how management determines that management controls utilized to verify that the procedures for preparation, validation and routine utilization of the information system have been followed.

Response:

Document reviews, QC surveillances, and QA audits are the controls used by management to assure that the established management controls described in answer to other questions, are being implemented.

In addition to performing reviews of draft procedures and related revisions, the Maintenance Manager reviews completed Maintenance Work Orders and completed procedure data packages to ensure activities are being planned and performed consistent with the governing administrative controls.

By procedure, completed maintenance procedures are also reviewed by the Plant Operations Review Committee.

Maintenance activities are also subject to monitoring by Quality Control and maintenance supervision. These work-in-progress monitoring efforts provide timely assessment of how well planning expectations are being met and provide assessment of the effectiveness of management controls.

In addition, the management controls are subject to routine audit at least semiannually. This includes the review of corrective action planning coordinated by maintenance supervision to assure proper classification of safety related work and selection of the appropriate governing procedure, as applicable. Audits also review maintenance procedures for their currency and utilization of appropriate replacement parts. The need for and adequacy of post maintenance testing and other pertinent job related activities are also reviewed during these audits. Test control and other operational audits augment the maintenance audits to assure that specified surveillance requirements of Technical Specifications are being performed as prescribed.